

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address J. Bennett Friedman, Esq. (SBN 147056) Michael Sobkowiak, Esq. (SBN 242718) Friedman Law Group, P.C. 1900 Avenue of the Stars, 11th Fl., Los Angeles, CA 90067 T: (310) 552-8210; F: (310) 733-5442 Lawrence E. Tofel, Esq. (Pro Hac Vice) Lawrence E. Tofel, P.C. 163 Washington Ave., Ste 5B Brooklyn, New York 11205 <input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Plaintiffs	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION	
In re: Mark Elias Crone, <div style="text-align: right;">Debtor(s).</div>	CASE NO.: 2:17-bk-12392-BR ADVERSARY NO.: 2:17-ap-01289-BR CHAPTER: 7
CKR Global Advisors, Inc. and Jeffrey A. Rinde, <div style="text-align: right;">Plaintiff(s).</div> <div style="text-align: center;">vs.</div> Susan Crone, Gary Gorham and Leonidas P. Flangas, <div style="text-align: right;">Defendant(s).</div>	<div style="text-align: center;"> JOINT STATUS REPORT [LBR 7016-1(a)(2)] </div> <div style="padding-top: 10px;"> DATE: 10/17/2017 TIME: 2:00 p.m. COURTROOM: 1668 ADDRESS: 255 E. Temple St. Los Angeles, CA 90012 </div>

The parties submit the following JOINT STATUS REPORT in accordance with LBR 7016-1(a)(2):

A. PLEADINGS/SERVICE:

- | | | |
|---|---|--|
| 1. Have all parties been served with the complaint/counterclaim/cross-claim, etc. (Claims Documents)? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 2. Have all parties filed and served answers to the Claims Documents? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 3. Have all motions addressed to the Claims Documents been resolved? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 4. Have counsel met and conferred in compliance with LBR 7026-1? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

5. If your answer to any of the four preceding questions is anything other than an unqualified "YES," please explain below (*or on attached page*):

See section G below.

B. READINESS FOR TRIAL:

1. When will you be ready for trial in this case?
- | <u>Plaintiff</u> | <u>Defendant</u> |
|------------------|------------------|
| February 2018 | April, 2018 |
2. If your answer to the above is more than 4 months after the summons issued in this case, give reasons for further delay.
- | <u>Plaintiff</u> | <u>Defendant</u> |
|---|---|
| This case has gone through significant motion practice by defendants who are now dismissed from this action. Discovery will now commence. | Defendant Crone is requesting 4 - 6 month discovery period. |
3. When do you expect to complete your discovery efforts?
- | <u>Plaintiff</u> | <u>Defendant</u> |
|------------------|------------------|
| January, 2018 | February, 2018 |
4. What additional discovery do you require to prepare for trial?
- | <u>Plaintiff</u> | <u>Defendant</u> |
|--|---|
| Interrogatories, Requests for Admission, Requests for Production of Documents, Depositions | Interrogatories, Requests for Admission, Requests for Production of Documents, Depositions, Third Party Subpoenas |

C. TRIAL TIME:

1. What is your estimate of the time required to present your side of the case at trial (*including rebuttal stage if applicable*)?
- | <u>Plaintiff</u> | <u>Defendant</u> |
|------------------|------------------|
| 3-5 days | 5 days |
2. How many witnesses do you intend to call at trial (*including opposing parties*)?
- | <u>Plaintiff</u> | <u>Defendant</u> |
|-----------------------|-----------------------|
| Approximately 5 - 10. | Approximately 5 - 10. |

3. How many exhibits do you anticipate using at trial?

Plaintiff

Unknown at this time.

Defendant

Unknown at this time.

D. PRETRIAL CONFERENCE:

A pretrial conference is usually conducted between a week to a month before trial, at which time a pretrial order will be signed by the court. [See LBR 7016-1.] If you believe that a pre-trial conference is not necessary or appropriate in this case, please so note below, stating your reasons:

Plaintiff

Pretrial conference ☒ is ☐ is not requested
Reasons:

Narrow issues for trial.

Defendant

Pretrial conference ☒ is ☐ is not requested
Reasons:

Narrow issues for trial.

Plaintiff

Pretrial conference should be set after:
(date) 01/31/2018

Defendant

Pretrial conference should be set after:
(date) 01/31/2018

E. SETTLEMENT:

1. What is the status of settlement efforts?

None at this time.

2. Has this dispute been formally mediated? ☐ Yes ☒ No
If so, when?

3. Do you want this matter sent to mediation at this time?

Plaintiff

☒ Yes ☐ No

Defendant

☐ Yes ☒ No

F. FINAL JUDGMENT/ORDER:

Any party who contests the bankruptcy court's authority to enter a final judgment and/or order in this adversary proceeding must raise its objection below. Failure to select either box below may be deemed consent.

Plaintiff

☒ I do consent

☐ I do not consent

to the bankruptcy court's entry of a final judgment
and/or order in this adversary proceeding.

Defendant

☒ I do consent

☐ I do not consent

to the bankruptcy court's entry of a final judgment
and/or order in this adversary proceeding.

G. ADDITIONAL COMMENTS/RECOMMENDATIONS RE TRIAL: (Use additional page if necessary)

Leonidas Flangas, as individual, and Gary Gorham have been dismissed as defendants in the instant case. Mr. Gorham has filed a Motion for Attorney's Fees Under California CCP § 425.16(c) ("Motion"). The Motion is set to be heard on October 17, 2017, concurrently with the status conference.

Susan Crone will be moving this Court to consolidate the adversary proceedings Trustee v. Susan Crone AP-01276 and CKR Global v. Susan Crone AP 01289.

Respectfully submitted,

Date: 10/10/2017

Friedman Law Group, P.C.

Printed name of law firm

/s/J. Bennett Friedman

Signature

J. Bennett Friedman, Esq.

Printed name

Attorney for: CKR Global Advisors; Jeffrey A. Rinde

Date: 10/10/2017

Leonidas Flangas, Esq.

Printed name of law firm

/s/Leonidas Flangas

Signature

Leonidas Flangas, Esq.

Printed name

Attorney for: Susan Crone, Special Appearance

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

1900 Avenue of the Stars, 11th Floor, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled **JOINT STATUS REPORT** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On *(date)* 10/10/2017, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Stephen F Biegenzahn** efile@sfbllaw.com
- **Leslie A Cohen** leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com;allie@lesliecohenlaw.com
- **Howard M Ehrenberg (TR)** ehrenbergtrustee@sulmeyerlaw.com, ca25@ecfcbis.com;C123@ecfcbis.com;hehrenberg@ecf.inforuptcy.com
- **Jerome Bennett Friedman** jfriedman@flg-law.com, msobkowiak@flg-law.com;jmartinez@flg-law.com
- **David B Golubchik** dbg@lnbyb.com, dbg@ecf.inforuptcy.com
- **Jeffrey S Kwong** jsk@lnbyb.com, jsk@ecf.inforuptcy.com
- **Theresa Mains** theresa@theresamainspa.com
- **Scott J Tepper** scottjtepper@msn.com, scottjtepper@gmail.com

☐ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**:

On *(date)* 10/10/2017, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

The Hon. Barry Russell
United States Bankruptcy Court
255 E. Temple Street, Suite 1660
Los Angeles, CA 90012

☒ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)* _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

10/10/2017
Date

Jackeline Martinez
Printed Name

/s/Jackeline Martinez
Signature

VIA US MAIL

Susan I. Crone
104 Hollister Way South
Glastonbury, CT 06033

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